IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

HEALTHIER CHOICES MANAGEMENT CORP.,

v.

.

Plaintiff,

Case No. 1:20-CV-04816-TCB

PHILIP MORRIS USA, INC. and PHILIP MORRIS PRODUCTS S.A.,

,

Defendants.

PLAINTIFF'S MOTION TO FILE UNDER SEAL

Plaintiff Healthier Choices Management Corp. ("Healthier Choices") respectfully requests that the Court permit it to file under seal Plaintiff's Response and Objections to Defendants' Declarations and Exhibits in Support of their Motion for Attorneys' Fees, as well as Plaintiff's supporting Declaration and accompanying Exhibits. Plaintiff's Response and Objections refer to Defendants' filings that they requested be filed under seal (*see* Dkt. Nos. 67–68), which the Court subsequently granted (Dkt. No. 72). Thus, as a courtesy to Defendants and to comply fully with this Court's Orders, Plaintiff now requests that its Response and Objections also be permitted to be filed under seal.

Plaintiff takes no position on the propriety of Defendants' underlying request to file any material under seal.

Dated: February 7, 2022 Respectfully submitted,

/s/ Alycen Moss

Alycen Moss

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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D) the undersigned hereby certifies that the foregoing document has been prepared in Times New Roman, 14 point, one of the four fonts and points approved by the Court in L.R. 5.1C.

/s/ Alycen Moss
Alycen Moss

CERTIFICATE OF SERVICE

The undersigned herby certifies that on February 7, 2022, the foregoing document was filed with the Clerk of the Court using CM/ECF, which will send electronic notification of such filing to all counsel of record.

/s/ Alycen Moss
Alycen Moss